

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:	)	Case No. 23-03120
Marcin Caba	)	Chapter 13
	)	Judge: A. Benjamin Goldgar
Debtor	)	

**NOTICE OF MOTION AND CERTIFICATE OF SERVICE**

Marcin Caba  
1539 W Remington Lane  
Round Lake, IL 60073

DAVID FREYDIN LTD  
8707 SKOKIE BLVD #305  
SKOKIE, IL 60077

Please take notice that on June 02, 2023 at 10:30 am, a representative of this office shall appear before the Honorable Judge A. Benjamin Goldgar, or any judge sitting in that judge's place, either in Courtroom 642 of the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, IL 60604 or electronically as described below and present the Trustee's motion a copy of which is attached.

**All parties in interest, including the movant, may appear for the presentment of the motion either in person or electronically using Zoom for Government (audio only).**

**To appear by Zoom using the internet,** use this link: <https://www.zoomgov.com/join>. Then enter the meeting ID and password.

**To appear by Zoom using a telephone,** call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

**Meeting ID and password.** The meeting ID for this hearing is **160 817 7512** and the passcode is **623389**. The meeting ID and passcode can also be found on the judge's page on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion without a hearing.

I certify that this office caused a copy of this notice to be delivered to the above listed debtor by depositing it in the U.S. Mail at 801 Warrenville Road, Lisle, IL and to the debtor's attorney electronically via the Court's CM/ECF system on May 25, 2023.

801 Warrenville Road, Suite 650  
Lisle, IL 60532-4350  
Ph: (630) 981-3888

/s/ Dana Twombly  
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FOR: Glenn Stearns, Chapter 13 Trustee

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**MOTION TO DISMISS FOR UNREASONABLE DELAY**

Now comes Glenn Stearns, Chapter 13 Trustee, and requests dismissal of the above case pursuant to 11 U.S.C. Section 1307 (c) and in support thereof, states the following:

1. The Debtor filed a petition under Chapter 13 on Wednesday, March 8, 2023.
2. The Debtor has failed to:
  - a. Conclude the regularly scheduled Section 341 Creditor Meeting.
3. As a result, the Debtor has failed to comply with the Bankruptcy Code and has caused an unreasonable delay that is prejudicial to creditors.

WHEREFORE, the Trustee prays this case be dismissed for cause pursuant to Section 1307 (c).

Glenn Stearns, Chapter 13 Trustee  
801 Warrenville Road, Suite 650  
Lisle, IL 60532-4350

Respectfully Submitted;

/s/ Glenn Stearns

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FOR: Glenn Stearns, Chapter 13 Trustee